



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

HERM 4122
SGC
SEP 29 1999

SEP 27 1999

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Mr. Gale Chapman
President and Chief Operations Officer
Intermountain Power Service Corporation
850 West Brush Wellman Road
Delta, Utah 84624-9546

Dear Mr. Chapman:

This letter is in response to a request forwarded to me by Ms. Patti Kimes, Radian Corporation, regarding the trial burns Intermountain Power is planning using petroleum coke and how these trial burns would impact on your response to the U.S. Environmental Protection Agency's mercury information collection request (ICR). Our purpose in developing the ICR was to establish utility mercury emissions over calendar year 1999. If your facility has not burned, and will not burn, petroleum coke during calendar year 1999 and is just getting it for a test burn to be conducted during calendar year 2000, then you will not have to analyze the petroleum coke under the ICR. However, if your plans change and you conduct the test burn(s) during calendar year 1999, you would be subject to the fuel analysis provisions of the ICR for the petroleum coke just as you currently are for your coal. With regard to the speciated mercury emissions testing, if the trial burn(s) using petroleum coke are conducted during calendar year 1999, you would be required to conduct only one set of tests, either on coal alone or on the coal/petroleum coke blend, but would not have to test both scenarios.

I hope that this answers your questions.

Sincerely yours,

William H. Maxwell

William H. Maxwell
Combustion Group
Emission Standards Division

cc: Lara Autry, EPA/EMAD (MD-14)
Bill Grimley, EPA/EMAD (MD-19)
Rick Vetter, EPA/OGC (MD-13)

Feasibility Study Progress Meeting

October 5th, 1999

Agenda

1. Commodities, Leslie
- 1.1. Pet coke presentation
2. Permitting, Patti, Jodean
- 2.1. Test permit application
- 2.2. IPA memorandums
- 2.3. Other permit issues
3. Trial Burn, Jerry
- 3.1. When
- 3.2. Test plan
- 3.3. Pet coke purchase and delivery
- 3.4. Effect on scrubbers - DBA — WHO DOES THIS?

4. Schedule, Jonas
5. Technical, Jonas

- 5.1. Process design basis
- 5.2. Process studies

- 5.2.1. Energy consumption optimization
- 5.2.2. Ammonia storage

- 5.2.3. Water quality - 20.000ppm Cl⁻

- 5.2.4. HCl & HF removal — Plume i. Chunch.

- 5.2.5. Oxidation air containment — Where To Route Excess F.O. Air. (Pressurized)

6. MOA, Lance

7. New Action Items and Activities to be Completed by Next Meeting, All

8. Next meeting,

1-2ppm NH₃ leaving SCRUBBER
CPO OF

DESIGN ISSUES
- Waste Steam or HEAT — Flue Gas / @ Scrubber Inlet.
- Pump / CPS — 3 nos Improving — Jump to 6 lines? — UREA
- Plume i. Chunch. — Where To Route Excess F.O. Air. (Pressurized)

No (NH₄)₂SO₄ Discussion yet

Pesticide / FERTILIZER REGISTRATION
TSCA

From: Patti Kimes <Patti_Kimes@radian.com>
To: <bharve@LADWP.com>, <Gale-C@ipsc.com>, <Jerry-H@ipsc.com>, <jgiese@LADWP.com>, <Jon-F@ipsc.com>, <lancel@ipautah.com>, <mgaines@rwbeck.com>, <stan-s@ipsc.com>, David Colley <David_Colley@radian.com>, Leslie Wilkinson <Leslie_Wilkinson@radian.com>, Klingspor_Jonas <Jonas_Klingspor@radian.com>, Bill Horton <Bill_Horton@radian.com>, Tim Thomas <Tim_Thomas@radian.com>, Jim Dickerman <Jim_Dickerman@radian.com>, Don Jackson <Don_Jackson@radian.com>, <rand-c@ipsc.com>
Date: Wednesday, September 22, 1999 3:14:14 PM
Subject: Re: Mercury Analyses -Reply -Reply

Everyone,

EPA would require only one speciated mercury test, as stated below; either for coal alone or for the coke/coal blend.

Patti

Forward Header

Subject: Re: Mercury Analyses -Reply -Reply
Author: BILL MAXWELL <MAXWELL.BILL@epamail.epa.gov> at INTERNET
Date: 9/22/1999 1:42 PM

They would be required to conduct one set of tests, either on coal alone or on the coal/pet coke blend, but would not have to test both scenarios.

>>> Patti Kimes <Patti_Kimes@radian.com> 09/22/99 09:24am >>>
Bill,

If the source discussed in the previous e-mails were to conduct the test burn in calendar year 1999, and they are required to conduct speciated mercury emissions testing for coal, would they also be required to conduct speciated testing for the petroleum coke/coal blend?

Thanks for your help.

Patti Kimes
Radian International
(801) 261-9483

Reply Separator

Subject: Mercury Analyses -Reply
Author: BILL MAXWELL <MAXWELL.BILL@epamail.epa.gov> at INTERNET
Date: 9/10/1999 2:25 PM

Our purpose in developing the ICR was to establish mercury emissions over calendar year 1999. If the facility has not burned, and will not burn, pet coke during 1999 and is just getting it for a test burn during 2000, then they will not have to analyze the pet coke under the ICR. However, if their plans change and they conduct the test burn during 1999, they would be subject to the analysis.

Rand Crafts - Notice of Intent Letter

From: Jodean Giese <jgiese@ladwp.com>
To: <dwong@ladwp.com>
Date: Monday, October 04, 1999 12:37:12 PM
Subject: Notice of Intent Letter

Please incorporate the following changes to the letter.

Bullet 6: Operation at IGS is 24 hours per day. There is no anticipated increase in capacity factor at IGS.

Under the Prevention of Significant Deterioration heading:
 We believe that the use of Pet Coke as an alternate fuel will not constitute a major modification under 40 CFR Part 52.21 for the following reasons:

- * We anticipate that there will be no significant net increase in actual emissions as there will be no significant increase in emissions per BTU nor any increase in capacity factor.
- * The IGS units are capable of accommodating a blend of Pet Coke and coal.
- * Use of Pet Coke blended with coal will be for trial test burns.

Thanks.

CC: <Bruce_Harvey/GBU/ES/LADWP>, <Rand-C@ipsc.com>, <Stan-S@ipsc.com>, <lancel@ipautah.com>, <Patt_Klmes@radian.com>

EMP -



2a

From: Rand Crafts
To: Jodean Giese
Date: Monday, November 08, 1999 12:11:53 PM
Subject: Comments regarding NOI, etc.

Regarding draft AO from Nando-
After meeting with Stan and Blaine, we have the following comments:

Item 2. - Refers to 90 days from date of AO and 120 day burn period. Should change for consistency. (120 days preferred.)

Item 3. - Because of control problems with mixing pet coke and coal, should we have this changed so that we do not exceed an AVERAGE blend of 20%?

Items 4 & 5. - Both items refer to IPSC Approval Order DAQE-028-097. We need to have these items refer to our Title V Permit instead. The reasons being: first-the AO was voided and superceded, second-there are numerous conflicts between the AO and the Title V Permit such as NOx limits, heat input limitations, PM10 vs. TSP, Title IV requirements, and others.

Item 5. - Reference to 90% removal is a repeat of the summary in our test burn plan we had submitted to Nando. However, we should affirm that this refers to 90% removal based on a 30 day rolling average. Some instantaneous drops can be expected, as with normal operation.

Item 6. - We do not measure PM10. This reference must be removed from the CEM statement. If the State wants this number, it can be calculated, but not monitored.

The paragraph following Item 6 refers to reporting test results. The last sentence states that we have to provide information if ANY of the 188 HAPs are present in the pet coke. This is an onerous and preposterous request. We cannot and will not test for 188 chemical compounds in our fuel. We are not regulated for HAPs, HAPs are only reported due to inventory and fee requirements. The HAPs rules do not refer to HAPs in fuel sources beyond what is expected to be emitted. We can provide numbers, based upon fuel content and/or emission factors, for those HAPs REASONABLY expected to be emitted - such as heavy metals.

We received e-mail today that the pet coke available for the test burn will have 5% or more sulfur, and that this may be of concern. Given the way we wrote the NOI, the fact that Nando had no sulfur limits in the experimental AO, and that the plan now is to use a scrubber additive for the test burn leaves me to believe we are still OK with the test burn at 5% sulfur.

Finally, we need to upload mercury data to EPA right away. If you have no objections by tomorrow, we will go ahead and upload.

If you have any questions or comments, please call.
Thanks

Rand Crafts, Intermountain Power
rand-c@ipsc.com
435-864-6494

CC: Blaine Ipson; Stan Smith

From: Jerry Hintze
To: Gale Chapman; Jon Finlinson; Rand Crafts; Stan Smith
Date: Monday, November 08, 1999 10:07:50 AM
Subject: Pet Coke Burn Postponed until November 29

I just got off the phone with Lance Lee. It looks like the earliest we will be able to do the test burn is November 29. They are having a hard time getting a source with load-out for just one train that is low sulfur (3%-4%). The first sample we tested from Carson would require major improvements to get their load-out on line. They are now looking at using a 5% sulfur source for the test burn which would require the scrubber additive for us to remain in compliance. I will be discussing with Radlan today the details of how the additive will be injected.

Lance has some concerns about the language of the NOI that would prohibit us from using 5% pet coke. He will be discussing that with Jodean today if you would like to have some input.

CC: Aaron Nissen; Dennis Killian; James Nelson